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11 *Attorneys for Plaintiff, Wells Fargo Bank N.A. as Trustee on behalf of the Certificate holders  
12 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series, 2005-WCW1*

13 **UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA**

15 WELL'S FARGO BANK, N.A. AS TRUSTEE  
16 ON BEHALF OF THE CERTIFICATE-  
17 HOLDERS PARK PLACE SECURITIES,  
18 INC. ASSET-BACKED PASS-THROUGH  
19 CERTIFICATES SERIES 2005-WCW1,

20 Plaintiff,  
21 vs.

22 FIDELITY NATIONAL TITLE GROUP,  
23 INC.; FIDELITY NATIONAL TITLE  
24 INSURANCE COMPANY; DOE  
25 INDIVIDUALS I through X; and ROE  
26 CORPORATIONS XI through XX, inclusive,

27 Defendants.

28 Case No.: 2:22-cv-00616-APG-EJY

29 **STIPULATION AND ORDER TO  
30 EXTEND TIME TO FILE AMENDED  
31 COMPLAINT**

32 **(Second Request)**

33 Plaintiff, Wells Fargo Bank N.A. as Trustee on behalf of the Certificate holders Park Place  
34 Securities, Inc. Asset-Backed Pass-Through Certificates Series, 2005-WCW1 ("Wells Fargo"),  
35 and Defendants Fidelity National Title Group, Inc.("FNTG") and Fidelity National Title  
36 Insurance Company ("FNTIC" collectively the "Defendants" and with Wells Fargo, the "Parties),  
37 hereby submit the following Stipulation to Extend Time to File Amended Complaint. The Parties,  
38 by and through their undersigned counsel, stipulate and agree as follows:

39 1. On April 12, 2022, Wells Fargo filed its Complaint in Eighth Judicial District Court, Case  
40 No. A-22-851046-C [ECF No. 1-1];

1       2. On April 13, 2022, Defendants filed a Petition for Removal to this Court [ECF No. 1];

2       3. Thereafter, on October 28, 2022, the Court granted in part FNTIC’s motion to dismiss

3           [ECF No. 17] and ordered that Wells Fargo may file an amended complaint, if facts exist

4           to do so [ECF No. 27];

5       4. Wells Fargo’s deadline to file its Amended Complaint is currently November 23, 2022;

6       5. Wells Fargo has conferred with Defendants and requested an extension of seven (7) days

7           to November 30, 2022, to file its Amended Complaint to allow counsel for Wells Fargo

8           additional time to finalize due to the upcoming Thanksgiving holiday;

9       6. Defendants do not object to the requested extension;

10      7. The Parties hereby agree that Wells Fargo shall have an additional seven (7) days up to

11           and including November 30, 2022 to file its Amended Complaint.

12      8. This is the second request for an extension which is made in good faith and not for purposes

13           of delay.

## **IT IS SO STIPULATED.**

DATED this 23<sup>rd</sup> day of November, 2022.

DATED this 23<sup>rd</sup> day of November, 2022.

## WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ *Lindsay D. Dragon*

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as Trustee on behalf of the Certificate holders  
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Pass-Through Certificates Series, 2005-  
WCWJ*

/s/ Kevin S. Sinclair

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*Attorney for Defendants, Fidelity National Title Group, Inc. and Fidelity National Title Insurance Company*

## **IT IS SO ORDERED.**

DATED: November 23, 2022

Layna J. Zanchah  
UNITED STATES MAGISTRATE JUDGE